

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: MONICA BORJA, aka : **Chapter 13**
Monica Borja-Rubio, aka Monica Rubio : **Case No.: 22-10001-pmm**
Debtor :

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES Debtor(s) **MONICA BORJA**, by and through their attorney, J. ZAC CHRISTMAN, ESQUIRE, and in Response to the Trustee's Motion to Dismiss avers:

1. Admitted.
2. Admitted.
3. Denied. Debtor has paid \$ 5,948 to date. Decreased income caused an issue with automatic payments via TFSBillpay that exacerbated the issue of decreased income. Debtor is mailing \$2,000 via certified funds on January 27, 2023. Debtor anticipates paying at least an additional \$3,000 prior to the hearing. As the Plan pays all timely filed and allowed unsecured claims in full, it is in the best interest of creditors and the Estate to provide Debtor an opportunity to bring the Plan payments current.
4. Admitted. However, all prior cases sought to save Debtor's residence from foreclosure. That property is going to Sheriff's Sale on April 6, 2023. After April 6, 2023, there will be no basis to dismiss Debtor's case, as any future case would merely be to satisfy unsecured and priority debt.

WHEREFORE, Debtor(s) **MONICA BORJA** respectfully prays this Honorable Court for an Order that the Trustee's Motion to Dismiss be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

/s/ J. Zac Christman
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